Austin, Texas
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PRE-APPEAL BRIEF REQUEST FOR REVIEW
AND STATEMENT OF REASONS

Sir:

Applicant requests review of the Final Rejection in the above-identified application. No amendments are being filed with the request. This request is being filed with a Notice of Appeal. The following sets forth a succinct, concise, and focused set of arguments for which the review is being requested.

CLAIM STATUS

Claims 1 - 19 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Chiang, et al., U.S. Publication No. 2004/0221292 (Chiang).

REMARKS

The present invention, as set forth by independent claim 1, relates to an apparatus for interfacing between a systems management system and a remote services system which includes a systems management application program interface and a systems management integrator. The systems management integrator application program interface provides a normalization point where data from the systems management system is normalized to a remote services system

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standard. An integrator is coupled between the systems management application program interface and the systems management integrator application program interface whereby the integrator collects and detects information from the systems management system.

The present invention, as set forth by independent claim 11, relates to a systems management integrator application program interface for a remote services system which includes a forward calls component and a back-channel calls component. The forward calls component provides forwards calls from a systems management system to the remote services system. The back-channel calls component provides back-channel calls from the remote services system to the system management system.

The present invention, as set forth by independent claim 19, relates to a method for interfacing between a systems management system and a remote services system which includes a system management application program interface, a systems management system, and a systems management integrator. The systems management application program interface collects and detects information from the systems management system using a systems management integrator. The systems management integrator interfaces with the systems management system via the systems management application program interface. The systems management system provides and receives information for the remote services system and provides and receives information from a systems management integrator application program interface. The systems management integrator application program interface provides a normalization point where data from the systems management system is normalized to a remote services system standard.

Chiang relates to exchanging information between applications and more specifically to integrating dissimilar applications where one application executes on one platform and another application executes on another platform. The system enables the dissimilar applications to establish a dialog with one another to establish connectivity for transferring the information between the applications.

In response to Applicant's arguments distinguishing Chiang, the Examiner set forth:

In the remarks, Applicant agrued in substance that

(A) Prior Arts does not teach or suggest "a system management integrator application program interface providing a normalization point where data from the

systems management system is normalized to a remote services system standard and an integrator coupled between the systems management application program interface and the systems management integrator application program interface collecting and detecting information from the systems management system", as recited in claim 1. (Office Action 01/17/2006 Page 6)

As to point (A), Chiang teaches a connector or a data transformer, which inherently comprises network interfaces to communicate with various application servers and remote clients, is provided between the applications servers and the remote client applications to convert requests, transactions, or messages from the languages running on the application server to the language of the remote client applications, (i.e., normalizing data from the systems management system to a remote services system standard), wherein the data transformer detects and collects, then converts requests, transactions or messages from the languages running on the application server to the target languages to transmit to the remote client applications (Chiang, paragraphs [0030-0032], [0039] and [0079-0084]). (Office Action 01/17/2006 Page 6)

(B) Prior Art does not teach or suggest "a systems management integrator application program interface includes forward calls and back-channel calls components providing forward calls and back-channel calls between the systems management system and the remote services system", as claimed in claim 11. (Office Action 01/17/2006 Page 7)

As to point (B), Chiang teaches the data transformer/connector must inherently include network interfaces/components to transmit/forward the requests, transactions and/or messages between disparate servers and end user applications after converting them to appropriate target language (i.e., after normalizing the data to a remote services system standard) (Chiang, paragraphs [0039] and [0085-0086]). (Office Action 01/17/2006 Page 7)

The portability of the forward calls and back-channel calls components are also realized in the prior, wherein the Common Application Metamodel tool is used to simplified the design process by facilitating tooling solutions, data translation, and communication and collaboration between dissimilar and disparate applications (Chiang, paragraphs [0025] and [0079-0086]). The approach is consistent with the remote service delivery method and system used by the applicant (Specification, paragraphs [0008] and [0034-0035]). (Office Action 01/17/2006 Page 7)

Applicant's arguments as well as request for reconsideration filed on 11/30/2005 have been fully considered but they are not deemed to be persuasive. (Office Action 01/17/2006 Page 8)

However, the Examiner does not address, and in fact nowhere within Chiang is there any teaching of *a remote services system* as claimed, much less such *a remote services system* which includes a systems management application program interface and a system management integrator application where the systems management system is normalized to *a remote services system standard* as claimed or forward channel and back channel communication within *a*

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remote services environment as claimed. Accordingly, the examiner has not established anticipation of the claimed invention nor a prima facie case of obviousness of the claimed invention. (See MPEP § 2131 and 2142.
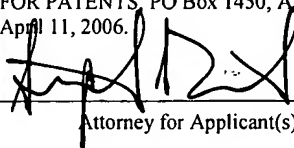
More specifically, Chiang does not teach or suggest an apparatus for interfacing between a systems management system and *a remote services system* which includes a systems management application program interface and a systems management integrator where the systems management integrator application program interface provides a normalization point where data from the systems management system is normalized to *a remote services system standard* and the integrator is coupled between the systems management application program interface and the systems management integrator application program interface whereby the integrator collects and detects information from the systems management system, all as required by claim 1. Accordingly, claim 1 is allowable over Chiang. Claims 2 - 10 depend from claim 1 and are allowable for at least this reason.

Chiang does not teach or suggest a systems management integrator application program interface for *a remote services system* which includes a forward calls component and a back-channel calls component wherein the forward calls component provides forwards calls from a systems management system to *the remote services system* and the back-channel calls component provides back-channel calls from *the remote services system* to the system management system, all as required by claim 11. Accordingly, claim 11 is allowable over Chiang. Claims 12 - 18 depend from claim 11 and are allowable for at least this reason.
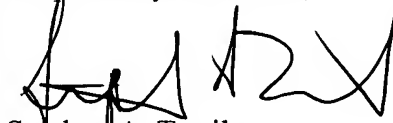
Chiang does not teach or suggest a method for interfacing between a systems management system and *a remote services system* which includes a system management application program interface, a systems management system, and a systems management integrator wherein the systems management application program interface collects and detects information from the systems management system using a systems management integrator and the systems management integrator interfaces with the systems management system via the systems management application program interface and where the systems management system provides and receives information for *the remote services system* and provides and receives information from a systems management integrator application program interface and wherein the systems management integrator application program interface provides a normalization point

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where data from the systems management system is normalized to *a remote services system standard*, all as required by claim 19. Accordingly, claim 19 is allowable over Chiang.

In view of the arguments set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, please telephone the undersigned.

Respectfully submitted,

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